

Between on or about December 7, 2023 and on or about December 12, 2023, in Clinton County in the Northern District of New York, and elsewhere, the defendant, **JHADER AUGUSTO URIBE-TOBAR**, and others, did conspire to commit alien smuggling by, knowing that a person believed to have the initials A.V.-F. was an alien, did bring to the United States in any manner whatsoever such person at a place other than a designated port of entry, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(i) and (a)(1)(A)(v)(I).

COUNT 2
[Alien Smuggling]

On or about December 11, 2023, in Clinton County in the Northern District of New York, and elsewhere, the defendant, **JHADER AUGUSTO URIBE-TOBAR**, knowing that a person believed to have the initials A.V.-F. was an alien, did bring to or attempt to bring to the United States in any manner whatsoever such person at a place other than a designated port of entry or place other than as designated by the Commissioner, regardless of whether such alien had received prior official authorization to come to, enter, or reside in the United States and regardless of any future official action which may be taken with respect to such alien, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i). That violation resulted in the death of A.V.-F., in violation of Title 8, United States Code, Section 1324(a)(1)(B)(iv).

COUNT 3
[Alien Smuggling]

On or about December 11, 2023, in Clinton County in the Northern District of New York, and elsewhere, the defendant, **JHADER AUGUSTO URIBE-TOBAR**, knowing and in reckless disregard of the fact that an alien believed to have the initials A.V.-F. had not received prior official authorization to come to, enter, and reside in the United States, did bring to the United States in any manner whatsoever, such alien, in violation of Title 8, United States Code, Section 1324(a)(2). That violation was done for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii). Count Three was the defendant's first violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii) in violation of Title 8, United States Code, Section 1324(a)(2)(B).

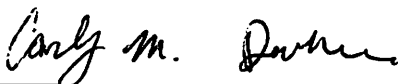
Dated: January 17, 2024

A TRUE BILL,

*name redacted

Grand Jury Foreperson

CARLA B. FREEDMAN
United States Attorney

By: 
Carling Dunham
Katherine Kopita
Assistant United States Attorneys
Bar Roll Nos. 703858, 517944